

EXHIBIT E

Billing Entry	Date	Initials	Claimed Hours	Claimed Rate	Plaintiff's Suggested Fee	MBUSA's Suggested Hourly Rate	MBUSA's Suggested Actual Reasonable Hours	Reasonable Actual Fee	Basis For Reduction
Services provided on 12/13/2022 - 2 internal messages sent/reviewed (0.10hrs)	12/13/22	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; prelitigation work is not recoverable; rate inflated
Services provided on 12/20/2022 - 2 internal messages sent/reviewed (0.10hrs)	12/20/22	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	same as above
Services provided on 1/5/2023 - 2 internal messages sent/reviewed (0.10hrs)	01/05/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	same as above
Services provided on 1/6/2023 - 1 internal message sent/reviewed (0.10hrs)	01/06/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	same as above
Services provided on 1/9/2023 - 1 internal message sent/reviewed (0.10hrs)	01/09/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	same as above
Services provided on 1/11/2023 - Phone Call To: Vadim Yarovoy (0.10hrs) - Phone Call To: Vadim Yarovoy (0.10hrs) - Memo created - Settlement Offer (0.20hrs) - 4 internal messages sent/reviewed (0.10hrs)	01/11/23	DTL	0.50	\$625.00	\$312.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated

Vehicle Inspection	01/20/23	DTL	1.20	\$675.00	\$810.00	\$350	1.20	\$420.00	No reduction of hours; rate inflated
Services provided on 1/23/2023 - Phone Call From: Vadim Yarovoy (0.10hrs)	01/23/23	DTL	0.10	\$625.00	\$62.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated
Services provided on 2/2/2023 - 3 internal messages sent/reviewed (0.10hrs)	02/02/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
Services provided on 3/4/2023 - Tesla battery replacement estimate_ reviewed (0.10hrs)	03/04/23	DTL	0.10	\$625.00	\$62.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated
tesla 12v battery replacement reviewed	03/06/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; rate inflated; clerical work as performed by a paralegal is not recoverable
Tesla battery replacement estimate_ reviewed	03/06/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; rate inflated; clerical work as performed by a paralegal is not recoverable
Invoice 1237 - HV Battery diagnostic - Vadim Yarovoy - 2014 Tesla S Base created	03/06/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; rate inflated; clerical work as performed by a paralegal is not recoverable
2019-09-11battery replacement reviewed	03/06/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; rate inflated; clerical work as performed by a paralegal is not recoverable
4 emails sent/reviewed	03/06/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	same as above; this is also unclear and vague and it is impossible to determine whether the task was necessary or reasonable to the litigation

Services provided on 3/6/2023 - Tesla Service Summary reviewed (0.10hrs) - supercharger-fix reviewed (0.10hrs) - 4 internal messages sent/reviewed (0.10hrs) the same	03/06/23	DTL	0.30	\$625.00	\$187.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
2 emails sent/reviewed	03/15/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 3/20/2023 - Phone Call From: Vadim Yarovoy (0.10hrs)	03/20/23	DTL	0.10	\$625.00	\$62.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated
1 email sent/reviewed	03/23/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; to the extent it is an internal email, internal comms are not recoverable; clerical work as performed by a paralegal is not recoverable
Services provided on 4/7/2023 - Invoice 1237 - HV Battery diagnostic - Vadim Yarovoy - 2014 Tesla S Base reviewed (0.10hrs)	04/07/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	Duplicative of above; rate inflated
Services provided on 4/17/2023 - 1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S (0.10hrs) - Phone Call To: Kevin S. Jay (0.10hrs)	04/17/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	Improper block billing; rate inflated

20140628_Purchase_agreement reviewed	04/19/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230419_Auto_Fraud_Warranty_Complaint created, then edited	04/19/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Matter admin	04/19/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Tesla Title reviewed	04/19/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20220920_airbag light_invoice reviewed	04/19/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
Investigation	04/19/23	JS	1.00	\$100.00	\$100.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable

Draft Pleading	04/19/23	JS	4.50	\$100.00	\$450.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Services provided on 4/19/2023 - 2 internal messages sent/reviewed (0.10hrs)	04/19/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230420_Civil Case Cover Sheet created, then edited	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.10	\$10.00	No reduction of hours
Tesla Service Summary reviewed	04/20/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230420_Summons created, then edited	04/20/23	JS	0.20	\$100.00	\$20.00	\$100	0.20	\$20.00	No reduction of hours
20140619__Penfed_Loan reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20220930_CostcoTireCenter_Front tires install reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable

20230420_CLRA Letter created	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20171212_Costco_ TireCenter_Invoice reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. In addition, this is duplicative of above as this was already reviewed
20180509_steering bolt recall letter 1 reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
Rebate Application Form reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
Matter admin	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
20180530_rear drive replacing reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
Model_3_New_Veh icle_Limited_Warra nty_NA_en reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230419_Auto_Fr aud_Warranty_Co mplaint edited	04/20/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	same as above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A- B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
20221009_tesla airbag from x estimate #2 reviewed	04/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable

Services provided on 4/21/2023 - 5 internal messages sent/reviewed (0.10hrs)	04/21/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230420_Civil Case Cover Sheet reviewed	04/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable
Services provided on 5/2/2023 - 20160212_Tesla Supercharging Order_email reviewed (0.10hrs) - Phone Call To: Kevin S. Jay (0.30hrs)	05/02/23	DTL	0.40	\$625.00	\$250.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
1 email sent/reviewed	05/08/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
1 email sent/reviewed	05/15/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
Services provided on 5/23/2023 - Phone Call From: Kevin S. Jay (0.10hrs)	05/23/23	DTL	0.10	\$625.00	\$62.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated
20230420_Summons edited	05/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable
20230525_Civil Case Cover Sheet edited and reviewed	05/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20230525_Yarovoy_JAMS_Petition reviewed	05/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above

Matter admin	05/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
20230525_Yarovoy_JAMS_Petition created, then edited	05/25/23	JS	0.80	\$100.00	\$80.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230525_Auto_Fraud_Warranty_Complaint edited	05/25/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	same as above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
1 email sent/reviewed	05/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 5/25/2023 - 20230525_Yarovoy_JAMS_Petition reviewed (0.20hrs) - 16 internal messages sent/reviewed (0.20hrs)	05/25/23	DTL	0.40	\$625.00	\$250.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated

Services provided on 5/26/2023 - 1 internal message sent/reviewed (0.10hrs)	05/26/24	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230601_Complaint created, then edited	06/01/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	Duplicative; clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
2023-05-12-complaint reviewed	06/01/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above; also duplicative of above
Services provided on 6/1/2023 - 2023-05-12-complaint created (0.10hrs) - 1 internal message sent/reviewed (0.10hrs)	06/01/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	Improper block billing; duplicative of above as the paralegal already created the complaint; rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

20230602_Complaint_DRAFT created, then edited	06/02/23	JS	4.10	\$100.00	\$410.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; duplicative of above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Services provided on 6/2/2023 - 1 internal message sent/reviewed (0.10hrs)	06/02/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
Auto_Fraud_Warranty_Complaint - LATEST created	06/05/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled

20230525_Auto_Fraud_Warranty_Complaint edited	06/07/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; duplicative of above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Services provided on 6/7/2023 - 20140421_purchase-agreement reviewed (0.10hrs)	06/07/23	DTL	0.10	\$625.00	\$62.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated
Services provided on 6/8/2023 - 6 internal messages sent/reviewed (0.10hrs)	06/08/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230616_Civil Case Cover Sheet edited and reviewed	06/16/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable
20230616_Summons edited and reviewed	06/16/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20230525_Auto_Fraud_Warranty_Complaint edited	06/16/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

Services provided on 6/16/2023 - 3 internal messages sent/reviewed (0.10hrs)	06/16/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230619_Newedit s_Complaint - LATEST created, then edited	06/19/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
20230619_Complaint_DTL edits edited	06/19/23	JS	2.20	\$100.00	\$220.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

Services provided on 6/19/2023 - 2023-05-12-complaint reviewed (0.10hrs) - 20230619_Complaint_DTL edits created, then edited (0.20hrs) - 20230616_Class Action_Complaint_DRAFT edited (0.50hrs) - 7 internal messages sent/reviewed (0.20hrs)	06/19/23	DTL	1.00	\$625.00	\$625.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated; duplicative of above. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
20230619_Complaint_DTL edits edited and reviewed	06/20/23	JS	1.30	\$100.00	\$130.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
20230619_Newedit s_Complaint - LATEST edited	06/20/23	JS	2.90	\$100.00	\$290.00	\$100	0.00	\$0.00	same as above
20140421_purchase-agreement reviewed	06/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative-this was already billed; clerical work as performed by a paralegal is not recoverable

20230619_Newedit s_Complaint - LATEST reviewed	06/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
20230616_Summo ns reviewed	06/20/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative-this was already billed at least twice; clerical work as performed by a paralegal is not recoverable
Services provided on 6/20/2023 - 20230619_Newedit s_Complaint - LATEST reviewed (0.10hrs) - 5 internal messages sent/reviewed (0.10hrs) - Matter admin (0.10hrs)	06/20/23	DTL	0.30	\$625.00	\$187.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Services provided on 6/21/2023 - 20230621_Yarovoy _Complaint created (0.40hrs)	06/21/23	DTL	0.40	\$625.00	\$250.00	\$350	0.00	\$0.00	Rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

20230616_Summons reviewed	06/26/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative-this has already been billed at least 3 times; clerical work as performed by a paralegal is not recoverable
Matter admin	06/26/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 6/26/2023 - 3 internal messages sent/reviewed (0.10hrs)	06/26/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230621_Yarovoy Complaint edited	06/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	paralegal and clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Repair Details created	06/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
Matter admin	06/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable

Tesla Service Summary reviewed	06/27/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20180530_rear drive replacing reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20160114_heater-fix reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20221021_airbag service reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
Repair Details created, then edited	6.28.23	JS	1.90	\$100.00	\$190.00	\$100	0.00	\$0.00	same as above
20210528_tesla 12v battery replacement reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20220208_Tesla LTE upgrade reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
20171211_driver-handle_Invoice reviewed	06/28/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	same as above
20221031_Tesla battery replacement estimate_ reviewed	06/28/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
Services provided on 6/28/2023 - Repair Details reviewed (0.10hrs) - 4 internal messages sent/reviewed (0.10hrs)	06/28/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
Services provided on 7/3/2023 - 20230525_Auto_Fraud_Warranty_Complaint reviewed (4.40hrs) - 20230701_Auto_Fraud_Warranty_Complaint created (0.10hrs)	07/03/23	DTL	4.50	\$625.00	\$2,812.50	\$350	1.50	\$525.00	Rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

Services provided on 7/6/2023 - 20230706_Auto_Fraud_Warranty_Complaint created (1.50hrs) - 1 internal message sent/reviewed (0.10hrs)	07/06/23	DTL	1.60	\$625.00	\$1,000.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
Repair Details reviewed	07/10/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
1 email sent/reviewed	07/10/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 7/10/2023 - Repair Details reviewed (0.10hrs) - 20230706_Auto_Fraud_Warranty_Complaint edited (1.50hrs) - 20230621_Yarovoy_Complaint reviewed (0.50hrs)	07/10/23	DTL	2.10	\$625.00	\$1,312.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.

Matter admin	07/11/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
20230711Summons edited and reviewed	07/11/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	duplicative-this has already been billed several times; clerical work as performed by a paralegal is not recoverable
20230711_Yarovoy_Auto_Warranty_Complaint_FINAL reviewed	07/11/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
2023_Civil Case Cover Sheet Addendum created, then edited	07/11/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230711_Civil Case Cover Sheet edited and reviewed	07/11/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	duplicative-this was already billed several times; clerical work as performed by a paralegal is not recoverable

on 7/11/2023 - warranty summary reviewed (0.10hrs) - 20140421_purchas e-agreement reviewed (0.10hrs)- 20230711_Yarovoy _Auto_Warranty_C omplaint created, then edited (0.90hrs) - 20230711_Yarovoy _Auto_Warranty_C omplaint created (0.10hrs) - 20230711_Yarovoy _Auto_Warranty_C omplaint_FINAL created (0.10hrs) - Repair Details reviewed (0.70hrs) - Infotrack civil reviewed (0.10hrs) - infotrack fees	07/11/23	DTL	2.50	\$625.00	\$1,562.50	\$350	0.00	\$0.00	Improper block billing; rate inflated. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A- B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant.
on 7/12/2023 - CLT_Client Representation Agreement_Ltr created (0.20hrs) - 20230711_Civil Case Cover Sheet reviewed (0.10hrs) - 20230711_Yarovoy _Auto_Warranty_C omplaint_FINAL reviewed (0.10hrs)	07/12/23	DTL	0.60	\$625.00	\$375.00	\$350	0.00	\$0.00	same as above
20230711_Notice of Case Management Conference created	07/13/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230711_Stampe d_Documents created	07/13/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230711_Notice of E-Filing Confirmation created	07/13/23	JS	0.10	\$100.00	\$0.00	\$100		\$100.00	N /A unbilled
Matter admin	07/13/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled

20230711_Stamped_documents created	07/13/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled
Services provided on 7/13/2023 - Memo created, then edited - call with client (0.10hrs) - 11 internal messages sent/reviewed (0.10hrs)	07/13/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
1 email sent/reviewed	07/14/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 7/14/2023 - 2023_Civil Case Cover Sheet Addendum reviewed (0.10hrs) - 20230711Summons reviewed (0.10hrs) - 4 internal messages sent/reviewed (0.10hrs)	07/14/23	DTL	0.30	\$625.00	\$187.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
Matter admin	07/17/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled
2023_Substitution of Attorney - Civil (Without a Court Order)-signed created	07/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable;
20230711_CivilCase_Coversheet_addendum created	07/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	duplicative-this was already billed; clerical work as performed by a paralegal is not recoverable; duplicative of above

1 email sent/reviewed	07/17/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 7/17/2023 - 6 internal messages sent/reviewed (0.10hrs)	07/17/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
4 emails sent/reviewed	07/18/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Summons Affidavit_26812244_Proof_of_Service_202307200057521 88 created	07/19/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable;
Services provided on 8/3/2023 - 1 internal message sent/reviewed (0.10hrs)	08/03/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230809_RFAs to_MFG_Set One created, then edited	08/09/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served discovery in this case and there is no evidence these were actually drafted or served
RFPS_MFG_Set One created, then edited	08/09/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	same as above

20230809_SRogs_MFG_Set One created, then edited	08/09/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	same as above
20230809_Deposition notice - Arbitration_Manufacturer created, then edited	08/09/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served with a deposition notice in this case and there is no evidence that any notice was actually drafted or served
20230809_Form Interrogatories General created, then edited	08/09/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served discovery in this case and there is no evidence these were actually drafted or served
998-01 - Yarovoy, Vadim reviewed	08/14/23	JS	0.10	\$100.00	\$10.00	\$100	0.10	\$10.00	No reduction of hours
Services provided on 8/14/2023 - 3 internal messages sent/reviewed (0.10hrs)	08/14/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
Services provided on 8/15/2023 - 20230522_Yarovoy_SAR_DTL_edits2 reviewed (0.10hrs) - 2023.05.24_Tesla_Settlement_Offer reviewed (0.10hrs) - 2 internal messages sent/reviewed (0.10hrs)	08/15/23	DTL	0.30	\$625.00	\$187.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated

1 email sent/reviewed	08/16/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 8/16/2023 - 2 internal messages sent/reviewed (0.10hrs) - Matter admin (0.10hrs)	08/16/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; prelitigation work is not recoverable; rate inflated
202300816_REMFC created, then reviewed	08/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; this also was not created by Plaintiff-if anything it was reviewed since Defendant removed this case
Ex A-Complaint reviewed	08/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230816_CRPDSO 1 created	08/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; this was also not created by Plaintiff-at best it was reviewed as Defendant filed this document
20230816_Civil Cover Sheet FINAL created	08/17/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; duplicative of above-this was already generated and filed and served at least a month ago
Matter admin	08/18/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
1 email sent/reviewed	08/18/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above

Consent or Declination to Magistrate Judge Jurisdiction created, then edited	08/21/23	JS	0.60	\$100.00	\$60.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; exaggerated-it does not take more than 0.1 to draft this simple form
Matter admin	08/21/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
2 emails sent/reviewed	08/21/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
Services provided on 8/21/2023 - Consent or Declination to Magistrate Judge Jurisdiction reviewed (0.10hrs) - 20230711_Notice of E-Filing Confirmation_Complaint reviewed (0.10hrs) - Consent or Declination to Magistrate Judge Jurisdiction reviewed (0.20hrs) - 10 internal messages sent/reviewed (0.10hrs)	08/21/23	DTL	0.50	\$625.00	\$312.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
3 emails sent/reviewed	08/22/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable;

Services provided on 8/22/2023 - 20230814_CCP 998_Offer to compromise reviewed (0.10hrs) - Phone Call To: Vadim Yarovoy (0.20hrs) - 12 internal messages sent/reviewed (0.30hrs)	08/22/23	DTL	0.60	\$625.00	\$375.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
Services provided on 8/23/2023 - 2 internal messages sent/reviewed (0.10hrs)	08/23/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	internal comms are not recoverable; rate inflated
20230824_Deposition notice - Arbitration_Manufacturer edited	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served a deposition notice in this case and there is no evidence this was actually drafted or served
20230824_RFAs to_MFG_Set One edited	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served discovery in this case and there is no evidence these were actually drafted or served
20230824_SRogs_MFG_Set One edited	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable. Moreover, Defendant was never served discovery in this case and there is no evidence these were actually drafted or served
Auto_Fraud_Warranty_Complaint - LATEST reviewed	08/24/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Also, why would the paralegal need to review Plaintiff's own complaint again when 23.8 hours were already spent drafting the complaint

Motion to Strike Affirmative Defenses created	08/24/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, this was never filed and there is no evidence this was actually drafted or filed
20230816_CRPDSO 1 reviewed	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; duplicative of above-this was already billed
20230824_Motion to Strike Affirmative Defenses_Draft created, then edited	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above; clerical work as performed by a paralegal is not recoverable. Moreover, this was never filed and there is no evidence this was actually drafted or filed
1 email sent/reviewed	08/24/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 8/24/2023 - Memo edited - Link (0.20hrs) - 3 internal messages sent/reviewed (0.10hrs)	08/24/23	DTL	0.30	\$625.00	\$187.50	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated
Consent or Declination to Magistrate Judge Jurisdiction edited	08/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above-this is now the third time this is being billed; clerical work as performed by a paralegal is not recoverable
20230823_Tesla_Answer_Doc_6 reviewed	08/25/23	JS	0.20	\$100.00	\$20.00	\$100	0.20	\$20.00	No reduction of hours
Consent or Declination to Magistrate Judge Jurisdiction reviewed	08/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above-this is now the fourth billing entry for this task; clerical work as performed by a paralegal is not recoverable;

Consent or Declination to Magistrate Judge Jurisdiction reviewed	08/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above-this is now the fifth billing entry for this task; clerical work as performed by a paralegal is not recoverable;
4 emails sent/reviewed	08/25/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 8/25/2023 - 8 internal messages sent/reviewed (0.10hrs)	08/25/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
20230828_Stipulation & Proposed Order Selecting ADR Process_Draft created, then edited and reviewed	08/28/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20230828_ADR Certification by Parties and Counsel_Draft created	08/28/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled
20230828_Stipulation & Proposed Order Selecting ADR Process_Draft reviewed	08/28/23	JS	0.10	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled

Services provided on 8/28/2023 - 20230828_ADR Certification by Parties and Counsel_Draft reviewed (0.10hrs) - 20230828_Stipulation & Proposed Order Selecting ADR Process_Draft reviewed (0.10hrs) - 1 internal message sent/reviewed (0.10hrs)	08/28/23	DTL	0.30	\$625.00	\$0.00	\$350	0.00	\$0.00	N /A unbilled
Services provided on 8/29/2023 - 1 internal message sent/reviewed (0.10hrs)	08/29/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated
list of deadlines based on the hearing date 10/19/2023 created, then reviewed	09/01/23	JS	0.70	\$100.00	\$70.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; exaggerated
Matter admin	09/01/23	JS	0.20	\$100.00	\$0.00	\$100	0.00	\$0.00	N /A unbilled
1 email sent/reviewed	09/01/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Matter admin	09/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
1 email sent/reviewed	09/27/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above
Services provided on 9/27/2023 - 1 internal message sent/reviewed (0.10hrs)	09/27/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	internal comms are not recoverable;rate inflated

2 emails sent/reviewed	09/28/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable
Services provided on 9/28/2023 - ESI_Checklist-12-1-2015 created (0.10hrs) - ESI_Guidelines-12-1-2015 created (0.10hrs) - Memo edited - call with client (0.10hrs) - Memo created - Tesla Bond Company (0.10hrs) - Memo created, then edited - Soheyl conf re Settlement, ESI, and Rule 26f Conference (0.10hrs) - 6 internal messages sent/reviewed (0.10hrs)	09/28/23	DTL	0.60	\$625.00	\$375.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; duplicative; rate inflated
20230929_Stip_E-discoveryOrderStandard reviewed	09/29/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. There is also no basis for this as it does not appear to relate to an order and there is no evidence that any such document was actually drafted, filed, or served on Defendant
20230929_Stip E-discovery OrderStandard.docx created, then edited and reviewed	09/29/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	same as above

3 emails sent/reviewed	09/29/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable;
Services provided on 9/29/2023 - 20230929_Stip E-discovery OrderStandard.doc x reviewed (0.10hrs) - 20230929_Stip_E-discoveryOrderStandard created (0.20hrs) - 20230929_Stip_E-discoveryOrderStandard created (0.20hrs) - 4 internal messages sent/reviewed (0.10hrs)	09/29/23	DTL	0.60	\$625.00	\$375.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; rate inflated. There is also no basis for this discovery order document as it does not appear to relate to an order and there is no evidence that any such document was actually drafted, filed, or served on Defendant
Model Stipulated Protective Order created, then edited	10/02/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. There is also no basis for this as it does not appear to relate to an order and there is no evidence that any such document was actually drafted, filed, or served on Defendant
Services provided on 10/2/2023 - 1 internal message sent/reviewed (0.10hrs)	10/02/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated

20231003_Settlement Agreement ltr reviewed	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. It is also unclear who drafted or sent this letter-is this something Plaintiff was drafting? There is no evidence this was actually drafted or sent to Defendant
Model Stipulated Protective Order edited and reviewed	10/03/23	JS	1.00	\$100.00	\$100.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. There is also no basis for this as it does not appear to relate to an order and there is no evidence that any such document was actually drafted, filed, or served on Defendant
Motion to Strike Affirmative Defenses reviewed	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above-this was already billed; clerical work as performed by a paralegal is not recoverable. There is also no basis for this as there is no evidence that any such document was actually drafted, filed, or served on Defendant
20230711_Notice of E-Filing Confirmation_Complaint reviewed	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.10	\$10.00	No reduction of hours
Model Stipulated Protective Order reviewed	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	Duplicative of above-this was already billed; clerical work as performed by a paralegal is not recoverable. There is also no basis for this as there is no evidence that any such document was actually drafted, filed, or served on Defendant
20231003_Settlement Agreement ltr created	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable
20231003_Settlement Agreement ltr created	10/03/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	duplicative of above; clerical work as performed by a paralegal is not recoverable

7 emails sent/reviewed	10/03/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; clerical work as performed by a paralegal is not recoverable
Services provided on 10/3/2023 - Model Stipulated Protective Order reviewed (0.20hrs) - 20231003_Settlement Agreement ltr created (0.40hrs) - 20230711_Yarovoy_Auto_Warranty_Complaint_FINAL reviewed (0.10hrs) - ESI_Checklist-12-1-2015 reviewed (0.10hrs) - Memo edited and reviewed - Soheyf conf re Settlement, ESI, and Rule 26f Conference (0.30hrs) - 25 internal messages sent/reviewed (0.30hrs)	10/03/23	DTL	1.40	\$625.00	\$875.00	\$350	0.00	\$0.00	Improper block billing; internal comms are not recoverable; duplicative; rate inflated. There is also no evidence that a SPO was ever drafted, served or filed

Services provided on 10/4/2023 - 1 internal message sent/reviewed (0.10hrs) - Matter admin (0.10hrs)	10/04/23	DTL	0.20	\$625.00	\$125.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20231005_Time_and_expenses_report created, then reviewed	10/05/23	JS	0.30	\$100.00	\$30.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20200527_Certification of Title reviewed	10/05/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	<p> duplicative of above-this was already billed; clerical work as performed by a paralegal is not recoverable. </p> <p> Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.) </p>

20231005_Time_and_expenses_report reviewed	10/05/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed	10/05/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Services provided on 10/5/2023 - 8 internal messages sent/reviewed (0.10hrs)	10/05/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

Registration_exp_07022024 created	10/06/23	JS	0.10	\$100.00	\$10.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
6 emails sent/reviewed	10/06/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Services provided on 10/6/2023 - 10 internal messages sent/reviewed (0.10hrs)	10/06/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Back_Side_Certificate of title edited	10/09/23	JS	0.10	\$100.00	\$10.00	\$100	0.10	\$10.00	No reduction of hours. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

6 emails sent/reviewed	10/09/23	JS	0.40	\$100.00	\$40.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Services provided on 10/9/2023 - 3 internal messages sent/reviewed (0.10hrs)	10/09/23	DTL	0.10	\$625.00	\$62.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
3 emails sent/reviewed	10/10/23	JS	0.20	\$100.00	\$20.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

									This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Matter admin	10/11/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	
Memo edited - Tesla Bond Company	10/11/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
6 internal messages sent/reviewed	10/11/23	JS	0.30	\$125.00	\$37.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

Memo edited - Soheyl conf re Settlement, ESI, and Rule 26f Conference	10/11/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
8 internal messages sent/reviewed	10/11/23	DTL	0.60	\$675.00	\$405.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
FRCP 68 - Yarovoy, Vadim reviewed	10/11/23	DTL	0.20	\$675.00	\$135.00	\$350	0.20	\$70.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Tesla Registration 2022-23 reviewed	10/12/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/12/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Registration_exp_07022024 reviewed	10/12/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	duplicative of above; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
33 internal messages sent/reviewed	10/12/23	JS	0.40	\$125.00	\$50.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

20200527_Certification of Title reviewed	10/12/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	duplicative of above; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
REG-262 created	10/12/23	DTL	0.10	\$675.00	\$0.00	\$350	0.00	\$0.00	N/A unbilled
20231003_Settlement Agreement letter reviewed	10/12/23	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
17 internal messages sent/reviewed	10/12/23	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

4 internal messages sent/reviewed	10/13/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 internal message sent/reviewed	10/13/23	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Matter admin	10/13/23	DTL	0.20	\$675.00	\$0.00	\$350	0.00	\$0.00	N/A unbilled

5 internal messages sent/reviewed	10/16/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Reg262_Signed created	10/16/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Reg262_Signed reviewed	10/16/23	DTL	0.30	\$675.00	\$202.50	\$350	0.30	\$105.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed regarding Vadim Yarovoy - 2014 Tesla Model S - vehicle surrender	10/18/23	JS	0.10	\$125.00	\$12.50	\$100	0.10	\$105.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

10 internal messages sent/reviewed	10/18/23	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$10.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
2 emails sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/18/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 email sent/reviewed regarding Yarovoy v Tesla	10/18/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
3 internal messages sent/reviewed	10/18/23	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Matter admin	10/19/23	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; admin work is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

2 internal messages sent/reviewed	10/20/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Memo created - call w Soheyl re fees and costs	10/20/23	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
4 internal messages sent/reviewed	10/20/23	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

19 internal messages sent/reviewed	10/23/23	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20230816_CRPDSO 1 reviewed	10/23/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	Duplicative-this was already billed; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
NOM attorneys fees and cost created	10/23/23	JS	0.50	\$125.00	\$62.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

20230711_Yarovoy _Auto_Warranty_C omplaint_FINAL reviewed	10/23/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	Duplicative; clerical work as performed by a paralegal is not recoverable; rate inflated. There is no need to review a complaint again at this point in the litigation when the case is settled. Moreover, in total, Plaintiff claims 23.8 hours for drafting and redrafting at least 12 different versions of the complaint. This is clearly duplicative and exaggerated since Plaintiff's firm files template complaints (Ex A-B.) At most, it took 1.5 hours to draft the single complaint that was ultimately filed and served on Defendant. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/23/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

20230711_Notice of Case Management Conference reviewed	10/23/23	JS	0.10	\$125.00	\$12.50	\$100	0.10	\$10.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
5 emails sent/reviewed regarding Vadim Yarovoy - 2014 Tesla Model S - vehicle surrender	10/23/23	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20231023_NOM attorneys fees and cost_DRAFT created, then edited	10/23/23	JS	0.40	\$125.00	\$50.00	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
8 internal messages sent/reviewed	10/23/24	DTL	0.40	\$675.00	\$270.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/24/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed regarding Vadim Yarovoy - 2014 Tesla Model S - vehicle surrender	10/24/23	JS	0.10	\$125.00	\$12.50	\$100	0.10	\$10.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Vehicle surrender date with client attended	10/24/23	DTL	1.00	\$675.00	\$0.00	\$350	0.00	\$0.00	N/A unbilled
NOM attorneys fees and cost reviewed	10/25/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 internal message sent/reviewed	10/25/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/26/23	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
2 emails sent/reviewed regarding Vadim Yarovoy - 2014 Tesla Model S - vehicle surrender	10/26/23	JS	0.20	\$125.00	\$25.00	\$100	0.20	\$20.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 email sent/reviewed regarding Yarovoy - 2014 Tesla Model S	10/27/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
5 internal messages sent/reviewed	10/27/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

2 internal messages sent/reviewed	11/01/23	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20231113_Jt_Notice_re-Settlement_DRAFT created	11/13/23	DTL	0.20	\$675.00	\$135.00	\$350	0.20	\$70.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
2023.05.08 Yarovoy SAR_DTL_edits reviewed	12/06/23	DTL	0.40	\$675.00	\$270.00	\$350	0.40	\$140.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

									This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; admin work is not recoverable; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Matter admin	01/19/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	
20240119_ADR Certification by Parties and Counsel created, then edited and reviewed	01/19/24	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	Duplicative-this was already billed; clerical work as performed by a paralegal is not recoverable. There is no evidence that any such document was actually drafted, filed, or served on Defendant -if anything, Plaintiff may have reviewed the document Defendant filed but that is not what is billed; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240119_ADR Certification by Parties and Counsel_Signed edited	01/19/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	same as above; duplicative of above

11 internal messages sent/reviewed	01/19/24	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
3 emails sent/reviewed regarding Case 3:23-cv-04182-JSC Yarovoy v. Tesla, Inc ADR Certification	01/19/24	JS	0.60	\$125.00	\$75.00	\$100	0.00	\$0.00	same as above; exaggerated
20240119_ADR Certification by Parties and Counsel_Signed reviewed	01/19/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
14 internal messages sent/reviewed	01/19/24	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

20240119_ADR Certification by Parties and Counsel reviewed	01/19/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 internal message sent/reviewed	01/24/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240119_ADR Certification by Parties and Counsel_Signed reviewed	01/24/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	Duplicative; clerical work as performed by a paralegal is not recoverable. There is no reason the paralegal should be signing the document for an attorney; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

6 internal messages sent/reviewed	01/25/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 email sent/reviewed regarding Yarovoy v. Tesla	01/25/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
2 internal messages sent/reviewed	01/25/24	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

4 internal messages sent/reviewed	01/29/24	JS	0.10	\$125.00	\$12.50	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
1 internal message sent/reviewed	01/29/24	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240201_Admn_Mtn_re_Briefing_Schedule created, then edited and reviewed	02/01/24	DTL	1.10	\$675.00	\$742.50	\$350	1.10	\$385.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240201_Admn_Mtn_re_Briefing_Schedule created, then edited	02/01/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

[Prop] Order re Reset Schedule created	02/01/24	DTL	0.20	\$675.00	\$135.00	\$350	0.20	\$70.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240201_LeBel_Decl_re_Briefing_Schedule created, then edited	02/01/24	DTL	0.30	\$675.00	\$202.50	\$350	0.00	\$0.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
3 internal messages sent/reviewed	02/01/24	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
[Prop] Order re Reset Schedule_FINAL created	02/01/24	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	Duplicative of above; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

14 internal messages sent/reviewed	02/02/24	JS	0.20	\$125.00	\$25.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
[Prop] Order re Reset Schedule created	02/02/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
5 internal messages sent/reviewed	02/02/24	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

1 internal message sent/reviewed	02/04/24	DTL	0.10	\$675.00	\$67.50	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20231005_Time_and_expenses_report reviewed	02/05/24	DTL	0.70	\$675.00	\$472.50	\$350	0.00	\$0.00	Purely clerical work is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240206_LeBel_Decl_ISO_Atty_Fees created, then edited and reviewed	02/06/24	DTL	0.60	\$675.00	\$405.00	\$350	0.60	\$210.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

20 internal messages sent/reviewed	02/07/24	JS	0.40	\$125.00	\$50.00	\$100	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; clerical work as performed by a paralegal is not recoverable; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Kaufman_Decl_Att_Fees & Cost created, then edited and reviewed	02/07/24	JS	0.30	\$125.00	\$37.50	\$100	0.00	\$0.00	clerical work as performed by a paralegal is not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240201_Amended_LeBel_Decl_re_Briefing_Schedule reviewed	02/07/24	JS	0.10	\$125.00	\$12.50	\$100		\$100.00	clerical work as performed by a paralegal is not recoverable; rate inflated. There is no reason a paralegal should be reviewing the work of an attorney who bills at \$675/hr. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240207_Kaufman_Decl_Att_Fees & Cost.docx reviewed	02/07/24	DTL	0.20	\$675.00	\$135.00	\$350	0.20	\$70.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)

10 internal messages sent/reviewed	02/07/24	DTL	0.20	\$675.00	\$135.00	\$350	0.00	\$0.00	This is vague and unclear and provides no detail as to what was done and thus it is impossible to determine if it was reasonable or necessary to the litigation of the case; internal comms are not recoverable; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240207_Kaufman_Decl_DTL edits_V2 created, then reviewed	02/07/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
20240207_Kaufman_Decl_DTL edits reviewed	02/07/24	DTL	0.10	\$675.00	\$67.50	\$350	0.10	\$35.00	No reduction of hours; rate inflated. Moreover, if this Court finds that Defendant's FRCP Rule 68 Offer is more than what Plaintiff reasonably incurred, none of the fees incurred after Oct 3, 2023 are recoverable (Ex D.)
Total Hours/Fees:			82.00		\$25,662.50		8.50	\$2,955.00	
Excessively billed hours for entirety of			73.50		Excessively billed fees for entirety of case:			\$22,707.50	